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20 **UNITED STATES DISTRICT COURT**
21 **NORTHERN DISTRICT OF CALIFORNIA**
22 **SAN JOSE DIVISION**

23 CELERINA NAVARRO, JANET STEVENS,
24 ARMANDO COVARRUBIAS, EVELYN
ESTRADA, GABRIEL RANGEL JAIME,
25 ALMA ALDACO, and all others similarly
situated,

26 Plaintiffs,
v.
27 THE CITY OF MOUNTAIN VIEW,
Defendant.

28 Case No. 5:21-cv-05381-NC

**DECLARATION OF QUYEN L. TA IN
SUPPORT OF PLAINTIFFS'
UNOPPOSED MOTION FOR
ATTORNEYS' FEES AND COSTS**

Date: February 15, 2022
Time: 1:00 p.m.
Place: Courtroom 5, 4th Floor,
San Jose Courthouse
Judge: Hon. Nathanael Cousins

1 I, Quyen L. Ta, being of age and sound mind hereby declare:

2 1. I am a partner with the law firm King & Spalding LLP, a member in good
3 standing of the State Bar of California, and admitted to practice in the Northern District. I am
4 counsel of record for Plaintiffs in this action. I submit this declaration in support of Plaintiffs'
5 Motion for Attorneys' Fees and Costs. The statements made in this declaration are made of my
6 own personal knowledge. If called as a witness, I could and would testify competently to the
7 facts set forth in this declaration

8 2. As the Court is aware, the parties reached agreement on a payment by Defendant
9 to Plaintiffs of \$ 750,000.00 (the "Agreed Fee Amount") in settlement of Plaintiffs' claims for an
10 award of attorneys' fees and costs, subject to the approval of this Court. At the insistence of
11 Plaintiffs' counsel, this amount was negotiated only after the conclusion of negotiations on all
12 substantive matters affecting the rights of the Plaintiff Class. The parties were significantly
13 assisted in their negotiations by United States Magistrate Susan van Keulen, who had earlier
14 facilitated successful negotiations that lead to the settlement of Plaintiffs' substantive claims.

15 3. The Agreed Fee Amount represents a significant reduction from the total amount
16 of fees incurred by Plaintiffs' counsel in this case, as measured by the number of hours incurred
17 by each timekeeper, multiplied by the hourly billing rate of that timekeeper. That total amount
18 was presented to Defendant's counsel, together with supporting time records, during the course
19 of the parties' negotiations. Even that amount, however, excluded any time incurred after
20 September 14, 2022, which has been substantial. In addition, the time records compiled by King
21 & Spalding excluded the time of several timekeepers who had worked on the case, and
22 eliminated other significant time entries; and I am informed and believe that my co-counsel made
23 similar exclusions and eliminations from their respective time records. In sum, the Agreed Fee
24 Amount represents a negative multiplier from the total fees incurred by Plaintiffs' counsel in this
25 action.

26 4. Having been involved in this case since late 2020, I believe that the Agreed Fee
27 Amount is more than reasonable. The remaining paragraphs of this declaration describe the
28 basis for Plaintiffs' attorneys' fee request, to the extent based on the work of King & Spalding in

1 this case. In the paragraphs that follow, I describe the relevant background and experience of
 2 King & Spalding's team and the role we have played in this case that justifies Plaintiffs' request
 3 for fees and costs.

EXPERIENCE AND QUALIFICATIONS KING & SPALDING'S ATTORNEYS

5. The fees Plaintiffs seek for work King & Spalding did was performed by the
 6 following attorneys: Quyen L. Ta, Arwen R. Johnson, Kelly Perigoe, Sam Diamant, Meghan
 7 Strong, and Rachel Rubens. Below I summarize each attorney's background and experience.

8. **Quyen L. Ta:** I am a partner at King & Spalding. I graduated from University of
 9 California, Berkeley, School of Law in 2003 and have been barred in California since January
 10 2004. After law school, I spent a year as Policy Counsel and a Public Interest Fellow for the
 11 National Partnership for Women & Families. I then clerked for the Honorable Lawrence K.
 12 Karlton on the United States District Court for the Eastern District of California. In 2006, I
 13 joined Keker, Van Nest & Peters LLP and was made a partner there in 2011. In 2018, I joined
 14 Boies Schiller Flexner LLP ("Boies Schiller") as the Office Managing partner, and then in May
 15 2020 I joined King & Spalding. I specialize in consumer class action defense, intellectual
 16 property, international arbitrations, trade secrets misappropriation, and other business disputes. I
 17 serve as lead counsel on class action matters for venture-backed and publicly-traded companies,
 18 including Walmart, Netgear, Public Storage, Flowers Foods, ExtraSpace Storage, Sutter Health,
 19 Molina Healthcare, and United Healthcare. I have also served as lead counsel on numerous pro
 20 bono and civil rights matters, including *Anh Le v. San Francisco District Attorney's Office*, 3:22-
 21 cv-00477 (N.D. Cal) and *City of Santa Ana v. County of Orange*, Case No. 8:20-cv-00069 (C.D.
 22 Cal.). I have been named a Top 100 Lawyer in California, a Top Woman Lawyer, a California
 23 Trailblazer, and a Leading 500 Lawyer in America.

24. **Arwen R. Johnson:** Ms. Johnson is a partner at King & Spalding. She graduated
 25 from UCLA School of Law in 2006 and has been barred in California since that same year.
 26 After law school, Ms. Johnson clerked for the Honorable Dean D. Pregerson on the United States
 27 District Court for the Central District of California and the Honorable Harry Pregerson on the
 28 Ninth Circuit Court of Appeals. In 2008, Ms. Johnson joined Caldwell Leslie & Proctor as a

1 civil litigator and was elevated to shareholder in 2014. Ms. Johnson next joined Boies Schiller as
 2 a partner in 2017, and then in May 2020 she joined King & Spalding. Ms. Johnson has a broad
 3 trial practice covering all aspects of complex civil litigation and class action defense on behalf of
 4 public companies, and has also been counsel in numerous pro bono and civil rights cases,
 5 including: *City of Santa Ana v. County of Orange*, Case No. 8:20-cv-00069 (C.D. Cal.), a case
 6 challenging Orange County's failure to provide housing and services to individuals experiencing
 7 homelessness; *Davies v. County of Los Angeles*, Case No. 2:14-cv-00907 (C.D. Cal.), a First
 8 Amendment action brought in partnership with the ACLU of Southern California challenging the
 9 Los Angeles County Board of Supervisors' decision to restore a cross to the county seal; and
 10 numerous other pro bono cases in partnership with Bet Tzedek, the California Women's Law
 11 Center, and the Inner City Law Center. Ms. Johnson has been recognized as one of the Top 100
 12 California Women Lawyers by the Los Angeles Daily Journal and as a Women of Influence by
 13 the Los Angeles Business Journal. Ms. Johnson received the First Amendment Award from the
 14 ACLU for her pro bono victory in the landmark *Davies v. County of Los Angeles* First
 15 Amendment case.

16 8. **Kelly Perigoe:** Ms. Perigoe is a partner at King & Spalding. She graduated from
 17 UCLA School of Law in 2009 and has been barred in California since 2010. After law school,
 18 Ms. Perigoe clerked for the Honorable Wallace Tashima on the Ninth Circuit Court of Appeals.
 19 In 2010, she joined Caldwell Leslie, and then joined Boies Schiller in 2017 as a partner. Most
 20 recently, in May 2020, Ms. Perigoe joined King & Spalding as a partner. Ms. Perigoe is a
 21 litigator with a focus on appeals in state and federal courts. Her practice covers a wide variety of
 22 substantive areas, including class actions, complex commercial litigation, and intellectual
 23 property. Ms. Perigoe has also been counsel in numerous pro bono and civil rights cases,
 24 including: *City of Santa Ana v. County of Orange*, Case No. 8:20-cv-00069 (C.D. Cal.), a case
 25 challenging Orange County's failure to provide housing and services to individuals experiencing
 26 homelessness; *Gamez v. United States, et al.*, Case No. 20-161680 (9th Cir.), a case involving an
 27 Eighth Amendment deliberate indifference challenge on behalf of an incarcerated plaintiff;
 28 *Eknes-Tucker, et al. v. Alabama*, Case No. 22-11707 (11th Cir.), a case challenging, on Due

1 Process and Equal Protection grounds, Alabama's SB 184, which criminalizes parents seeking
 2 essential medical care for their transgender children; and numerous other pro bono cases,
 3 including in partnership with the Inner City Law Center. Ms. Perigoe has been recognized as
 4 one of the Best Lawyers Under 40 by the LGBT Bar Association in 2018, a Southern California
 5 Top 50 Women Rising Star in 2018 and 2019, and a Super Lawyers Rising Star from 2016 to
 6 2019.

7 **9. Sam Diamant:** Mr. Diamant is presently a senior associate at King & Spalding
 8 who will be promoted to partner effective January 1, 2023. Mr. Diamant graduated from the
 9 University of North Carolina School of Law in 2012 and has been barred in California since
 10 January 2013. After law school, Mr. Diamant clerked for the Honorable William J. Lafferty on
 11 the United States Bankruptcy Court for the Northern District of California. Mr. Diamant then
 12 joined King & Spalding in 2014, where his practice focuses on commercial disputes, including
 13 matters involving licensing disputes, false advertising, breach of fiduciary duty, and various
 14 other business torts. Mr. Diamant has participated in the Ninth Circuit's pro bono program in the
 15 representation of a client seeking the asylum of the United States from political persecution. Mr.
 16 Diamant has been recognized as a Super Lawyers Rising Star in 2021 and 2022.

17 **10. Meghan Strong:** Ms. Strong is an associate at King & Spalding. She graduated
 18 from Georgetown University Law Center in 2018 and has been barred in California since that
 19 year. After law school, Ms. Strong worked at Boies Schiller as an associate before joining King
 20 & Spalding in 2020. In 2021, she clerked for the Honorable Laurel Beeler on the United States
 21 District Court for the Northern District of California before returning to King & Spalding in
 22 January 2022. Ms. Strong worked on this matter both before and after her clerkship. Ms.
 23 Strong's practice focuses on complex civil litigation, and she has served as counsel in multiple
 24 class actions. In addition to this case, Ms. Strong's pro bono experience includes representing a
 25 mother seeking sole custody of her two young children and working on *Anh Le v. San Francisco*
 26 *District Attorney's Office*, 3:22-cv-00477 (N.D. Cal), a case advocating for victims' rights and
 27 against hate crime.

28

1 11. **Rachel Rubens:** Ms. Rubens is an associate at King & Spalding. She graduated
 2 from the University of California, Davis School of Law in 2020 and has been barred in
 3 California since January 2021. After law school, Ms. Rubens joined King & Spalding, where
 4 she focuses on complex civil litigation, products liability, and mass torts. Ms. Rubens has
 5 worked on this action since shortly after joining King & Spalding. In addition, Ms. Rubens
 6 served as counsel in an affirmative asylum case, in which she won asylum for a mother and her
 7 two boys earlier this year.

8 12. Other attorneys and paralegals at King & Spalding also worked on and billed time
 9 to this case, but as further discussed below, King & Spalding made efforts to reduce its lodestar,
 10 and as a result it is not seeking to recover fees for individuals not listed herein.

11 **THE REASONABLENESS OF KING & SPALDING'S HOURLY RATES**

12 13. King & Spalding seeks a heavily discounted rate for work done on this case,
 13 which includes a discount off of King & Spalding's standard market rates for each attorney
 14 below. Rates change year-to-year, and King & Spalding seeks each attorney's respective
 15 discounted client rate for the year in which the work was performed. Those rates are listed
 16 below where applicable:

Attorney	Position	Graduation Year	2020 Rate/Hour	2021 Rate/Hour	2022 Rate/Hour
Quyen Ta	Partner	2003	\$990.00	\$1070.00	N/A
Arwen Johnson	Partner	2006	\$930.00	\$1015.00	\$1125.00
Kelly Perigoe	Partner	2009	\$880.00	\$960.00	\$1125.00
Sam Diamant	Senior Associate	2012	\$810.00	\$909.43	\$1024.61
Meghan Strong	Associate	2018	\$565.00	\$645.00	\$775.00
Rachel Rubens	Associate	2020	N/A	\$550.00	\$639.70

22 14. I believe that each of the hourly rates is reasonable for the services provided and
 23 competitive with the broader market for legal services among firms of this size in California. In
 24 setting its hourly rates, King & Spalding has done an analysis of its rates based on benchmarking
 25 services from Hildebrandt Peer Monitor and PricewaterhouseCoopers. According to that
 26 analysis, the King & Spalding rates in this matter are 5 to 15 percent below the 2021 AmLaw 50,
 27 top 75th percentile average standard rates for litigation, depending on the survey.
 28

1 **KING & SPALDING'S BILLING PRACTICES AND WORK PERFORMED**

2 **A. King & Spalding's Billing Practices**

3 15. I am familiar with my firm's billing practices and timekeeping practices. King &
 4 Spalding uses an electronic time entry and billing software system, in which attorneys and
 5 paralegals enter all of their time. For each entry, the timekeeper enters the case matter number,
 6 date of time entry, amount of time in tenths of an hour, and a description of the work performed.
 7 As a matter of practice, King & Spalding attorneys and paralegals record their time as
 8 contemporaneously as possible with the actual expenditure of time. Attorneys are required to
 9 enter and finalize all their time on a weekly basis.

10 **B. Work Performed by King & Spalding**

11 16. Co-counsel in this action shared and allocated responsibilities on this case to
 12 ensure coordination and efficient case management. Most of our work is described in our
 13 contemporaneous billing records, which are attached as **Exhibit A** to this Declaration with
 14 redactions to protect privileged and work product material. A summary of the work King &
 15 Spalding performed is also below.

16 17. In late 2020, King & Spalding partnered with the ACLU of Northern California,
 17 Disability Rights Advocates, and the Law Foundation of Silicon Valley to address the ordinances
 18 recently passed by Mountain View. From late 2020 through mid-2021, King & Spalding
 19 conducted extensive research and analysis regarding potential claims under the federal and
 20 California constitutions, as well as federal and state statutes. We then worked with co-counsel to
 21 draft a Complaint setting out Plaintiffs' claims, which we filed in July 2021.

22 18. King & Spalding has taken the laboring oar on drafting much of the briefing in
 23 this case. Our team drafted Plaintiffs' Motion for Preliminary Injunction in August 2021. We
 24 also drafted the Oppositions to Defendant's Motion to Dismiss and Request for Judicial Notice,
 25 which Mr. Diamant of King & Spalding argued on behalf of Plaintiffs.

26 19. King & Spalding has also participated in and supported settlement negotiations
 27 throughout 2021 and 2022 including attending several settlement conferences with Magistrate
 28 Judge van Keulen during 2022 and reviewing drafts of the settlement agreement.

1 20. In October and November, King & Spalding drafted Plaintiffs' Motion for
 2 Preliminary Approval of Class Action Settlement and Mr. Diamant argued the Motion before the
 3 Court.¹

4 21. Finally, King & Spalding provided periodic translation resources throughout the
 5 case, for which it seeks reimbursement of costs. This included, for example, translating the
 6 settlement agreement and other important documents into Spanish for the Named Plaintiffs.
 7 King & Spalding incurred costs of \$6,483.89 in connection with this matter.

8 **C. Lodestar Reductions to Fees**

9 22. In preparation for this Motion for Attorneys' Fees and Costs, the team at King &
 10 Spalding reviewed our records for duplication and/or inefficiencies and made discrete deductions
 11 from our total hours. For example, we have excluded all paralegal time and all time by an
 12 attorney who billed fewer than 50 hours on this case. In addition, for meetings with co-counsel
 13 or court appearances where more than one King & Spalding attorney was present, we have only
 14 charged for one attorney's time.

15 23. Together, these exercises in billing judgments reduced our total lodestar by 127
 16 hours and \$101,448.72 which is approximately a 17% reduction in our total billings. These
 17 hours are significantly more than what we are requesting this Court approve based on our
 18 settlement negotiations with the City.

19 24. King & Spalding undertook these efforts to reduce its lodestar in order to
 20 facilitate a settlement on fees, which was successful, but it does not in fact seek to recover any
 21 fees for itself. As a law firm pro bono partner, King & Spalding has donated the time of its
 22 attorneys to this case. King & Spalding will not retain any of the award which will be shared by
 23 the non-profit organizations who are co-counsel to King & Spalding in this action.

24
 25
 26 ¹ The Preliminary Approval of Class Action Settlement is part of the work King & Spalding
 27 performed but is not included in Exhibit A, which shows fees only through mid-September,
 28 2022. King & Spalding is also drafting the Motion for Final Approval of Class Action
 Settlement, which will be filed on December 22, 2022.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct, and that this declaration is executed at Berkeley, California this
3 13th day of December 2022.

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7 Quyen L. Ta
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EXHIBIT A

KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:
King & Spalding LLP
P.O. Box 116133
Atlanta, GA 30368-6133

By Wire: Truist Bank (formerly SunTrust Bank)
ABA: 061 000 104
SWIFT: SNTRUS3A
USD Account: 88003 12475
Account Name: King & Spalding

Invoice No.	10558182
Invoice Date	09/21/22
Client No.	99994
Matter No.	420356

RE: Challenge To RV Ban (City Of Mountain View)

For questions, contact:
Quyen Ta 1 415 318 1227

For Professional Services Rendered through 12/31/20:

Fees	\$	44,495.50
Total this Invoice	\$	44,495.50

99994 Zz994 Pro Bono
 420356 Challenge To RV Ban (City Of Mountain Vi
 09/21/22

Invoice No. 10558182
 Page 2

PROFESSIONAL SERVICES

Date	Timekeeper	Description	Hours
12/03/20	A Johnson	Co-counsel strategy call and analysis	0.8
12/08/20	Q Ta	Attend team meeting and discuss task list	1.0
12/10/20	S Diamant	Confer with Q. Ta and team regarding call scheduling and review of materials	0.7
12/11/20	S Diamant	Confer with Q. Ta and team regarding status and background; videoconference with Q. Ta and team regarding matter background and strategy; draft task list regarding research projects and fact investigation; revise same pursuant to A. Johnson comments; review background materials and case law from Law Foundation OneDrive; save materials to case file; confer with Q. Ta and team regarding background materials and case file	4.5
12/11/20	A Johnson	Analyze case background documents and research; emails and conference with K&S team regarding same and research assignments	2.0
12/11/20	K Perigoe	Attend team strategy meeting; prepare for same	1.0
12/11/20	M Strong	Case team strategy call; review case background materials	1.7
12/12/20	S Diamant	Review background materials and case law from Law Foundation OneDrive in advance of initial call with HP Enterprise team	4.6
12/13/20	S Diamant	Review background materials and case law from Law Foundation OneDrive in advance of initial call with HP Enterprise team	4.5
12/14/20	S Diamant	Pull briefing from [REDACTED] related proceeding and review of same; confer with S. Butler regarding same; confer with Q. Ta and team regarding status and case file	2.0
12/14/20	K Perigoe	Confer with A. Johnson regarding case strategy [REDACTED]	0.2
12/15/20	S Diamant	Confer with K. Perigoe regarding research issues; telephone conference with HP Enterprise and team regarding status and strategy; confer with Q. Ta and team regarding status, strategy, and staffing; draft common interest and confidentiality agreement; confer with Q. Ta and team	3.0

99994 Zz994 Pro Bono
 420356 Challenge To RV Ban (City Of Mountain Vi
 09/21/22

Invoice No. 10558182
 Page 3

Date	Timekeeper	Description	Hours
		regarding same	
12/15/20	A Johnson	Analyze research materials	0.5
12/15/20	K Perigoe	Review case documents	1.7
12/15/20	M Strong	Review Mountain View background materials	1.0
12/15/20	Q Ta	Attend weekly call with non-profits	0.7
12/16/20	S Diamant	Draft common interest and confidentiality agreement; review and analyze case law regarding [REDACTED] [REDACTED]	2.0
12/17/20	S Diamant	Draft common interest and confidentiality agreement; review and analyze case law regarding [REDACTED] [REDACTED]	4.0
12/17/20	A Johnson	Conference with M. Strong regarding strategy for research issues; emails with team regarding same and liaison issues	0.5
12/17/20	M Strong	Review co-counsel's research memos; call with A. Johnson regarding plan for researching claims	0.8
12/18/20	S Diamant	Confer with A. Johnson and team regarding draft common interest agreement and case status; confer with Law Foundation and ACLU teams regarding call scheduling	0.8
12/19/20	S Diamant	Review and analyze case law regarding [REDACTED] [REDACTED]	2.0
12/20/20	S Diamant	Review and analyze case law regarding [REDACTED]; review Law Foundation memorandum summarizing findings regarding same	3.0
12/21/20	S Diamant	Confer with nonprofit team regarding call scheduling; confer with Q. Ta and team regarding status and strategy	0.8
12/22/20	S Diamant	Confer with team regarding status and call scheduling; review memorandum by Law Foundation regarding [REDACTED]; telephone conference with Law Foundation, ACLU and DRA teams regarding analysis of [REDACTED]	3.2
12/23/20	S Diamant	Mountain View - Confer with Q. Ta and team regarding status and strategy; review additional authorities on right to travel doctrine	1.0
12/28/20	S Diamant	Review and analyze case law regarding [REDACTED] [REDACTED]	4.0
12/29/20	S Diamant	Review and analyze case law regarding [REDACTED] [REDACTED]	2.8

99994 Zz994 Pro Bono
420356 Challenge To RV Ban (City Of Mountain Vi
09/21/22

Invoice No. 10558182
Page 4

Date	Timekeeper	Description	Hours
		[REDACTED]	54.8

TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Value
Arwen Johnson	3.8	\$ 930.00	\$ 3,534.00
Kelly Perigoe	2.9	880.00	2,552.00
Quyen Ta	1.7	990.00	1,683.00
Sam Diamant	42.9	810.00	34,749.00
Meghan Strong	3.5	565.00	1,977.50
Total	54.8		\$44,495.5

Total This Invoice \$44,495.50

KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:
King & Spalding LLP
P.O. Box 116133
Atlanta, GA 30368-6133

By Wire: Truist Bank (formerly SunTrust Bank)
ABA: 061 000 104
SWIFT: SNTRUS3A
USD Account: 88003 12475
Account Name: King & Spalding

Invoice No.	10558182
Invoice Date	09/21/22
Client No.	99994
Matter No.	420356

RE: Challenge To RV Ban (City Of Mountain View)

For questions, contact:
Quyen Ta 1 415 318 1227

REMITTANCE

Please return this page with your remittance.

Amount Due This Invoice	\$44,495.50
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Payment is Due Upon Receipt

KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:
King & Spalding LLP
P.O. Box 116133
Atlanta, GA 30368-6133

By Wire: Truist Bank (formerly SunTrust Bank)
ABA: 061 000 104
SWIFT: SNTRUS3A
USD Account: 88003 12475
Account Name: King & Spalding

Invoice No.	10558179
Invoice Date	09/21/22
Client No.	99994
Matter No.	420356

RE: Challenge To RV Ban (City Of Mountain View)

For questions, contact:
Quyen Ta 1 415 318 1227

For Professional Services Rendered through 12/31/21:

Fees	\$	362,914.03
Total this Invoice	\$	362,914.03

99994 Zz994 Pro Bono
 420356 Challenge To RV Ban (City Of Mountain Vi
 09/21/22

Invoice No. 10558179
 Page 2

PROFESSIONAL SERVICES

Date	Timekeeper	Description	Hours
01/04/21	A Johnson	Analyze materials; emails with M. Strong regarding same	0.3
01/05/21	S Diamant	Telephone conference with HP Enterprise and case team; summarize call in writing for K&S team	1.0
01/05/21	Q Ta	Confer with non-profits regarding strategy and legal research	0.5
01/06/21	A Johnson	Confer with M. Strong on [REDACTED] issues; analyze memorandums regarding same	0.6
01/06/21	M Strong	Review co-counsel's research on [REDACTED]; call with A. Johnson to discuss [REDACTED] claims	0.9
01/08/21	S Diamant	Research and analyze case law regarding [REDACTED] [REDACTED]	1.2
01/10/21	S Diamant	Review [REDACTED] case law; draft memorandum summarizing findings regarding same	3.1
01/11/21	S Diamant	Review [REDACTED] case law; draft memorandum summarizing findings regarding same; draft and revise common interest agreement [REDACTED]; circulate draft common interest agreement to nonprofit team and HP Enterprise; telephone conference with Q. Ta and team regarding status and strategy	7.0
01/11/21	A Johnson	Confer with K&S team regarding research projects and strategy for complaint	0.5
01/11/21	M Strong	Research [REDACTED] claims; participate in team meeting; revise memorandum regarding [REDACTED] [REDACTED]	3.1
01/11/21	Q Ta	Review memorandum and edit same regarding procedural issues	0.5
01/11/21	Q Ta	Confer with team regarding memos and upcoming discussions for tomorrow	0.5
01/11/21	Q Ta	Review and edit memorandum regarding [REDACTED] issues; confer with [REDACTED] M. Strong regarding same	0.3
01/12/21	S Diamant	Telephone conference with nonprofit team and HP Enterprise regarding status and strategy; confer with K. Perigoe regarding [REDACTED] research and analysis; confer with ACLU	1.5

99994 Zz994 Pro Bono
 420356 Challenge To RV Ban (City Of Mountain Vi
 09/21/22

Invoice No. 10558179
 Page 3

Date	Timekeeper	Description	Hours
		regarding draft common interest agreement	
01/12/21	K Perigoe	Analyze [REDACTED] research	1.0
01/12/21	M Strong	Review team memos; research [REDACTED] claims; participate in weekly strategy call with co-counsel	5.2
01/12/21	Q Ta	Review [REDACTED] research from team; participate in group weekly call	0.7
01/13/21	S Diamant	Confer with nonprofits and HP Enterprise team regarding common interest agreement	0.3
01/13/21	M Strong	Update [REDACTED] memorandum and circulate to team	0.2
01/14/21	S Diamant	Draft and revise memorandum on [REDACTED] pursuant to K. Perigoe comments	0.8
01/14/21	M Strong	Call with Q. Ta to discuss [REDACTED] and related research	1.0
01/15/21	K Perigoe	Analyze [REDACTED] research	2.5
01/19/21	S Diamant	Telephone conference with team regarding strategy; confer with team regarding common interest agreement	0.7
01/19/21	Q Ta	Attend weekly pro bono team meeting	0.5
01/25/21	A Johnson	Confer with M. Strong regarding [REDACTED] research	0.2
01/25/21	K Perigoe	Analyze [REDACTED] issues	2.1
01/26/21	A Johnson	Confer with M. Strong regarding [REDACTED] research	0.3
01/26/21	M Strong	Draft memorandum analyzing [REDACTED] and related research	4.8
01/27/21	M Strong	Work on memorandum regarding [REDACTED]	1.5
01/28/21	M Strong	Work on memos regarding [REDACTED] [REDACTED]	4.1
01/29/21	A Johnson	Edit [REDACTED] memorandum and emails with M. Strong regarding same	1.0

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Date	Timekeeper	Description	Hours
01/29/21	M Strong	Incorporate A. Johnson's edits and revise [REDACTED] memorandum	2.0
01/30/21	S Diamant	Research and analyze [REDACTED] issues in preparation for memorandum regarding same	2.0
01/31/21	M Strong	Work on [REDACTED] memorandum	1.0
02/01/21	S Diamant	Review [REDACTED]; telephone conference with Q. Ta and team regarding status and strategy	2.6
02/01/21	A Johnson	Confer with team regarding case strategy and constitutional research	0.5
02/01/21	K Perigoe	Revise [REDACTED] memorandum; attend team meeting regarding status and strategy	4.2
02/01/21	Q Ta	Review [REDACTED] memorandum	0.5
02/02/21	A Johnson	Confer with M. Strong regarding [REDACTED] issues; confer with co-counsel and common interest counsel regarding research and case strategy	0.8
02/02/21	M Strong	Finalize and circulate memos to HPE and broader team; review memos in preparation for call; discuss claims during weekly group call	1.5
02/02/21	Q Ta	Call with team regarding legal research	0.3
02/04/21	S Diamant	Research and draft memorandum on [REDACTED]	5.5
02/05/21	S Diamant	Research and draft memorandum on [REDACTED] claims; confer with K. Perigoe regarding same	2.2
02/05/21	K Perigoe	Revise memorandum regarding [REDACTED]	1.0
02/07/21	S Diamant	Draft and revise [REDACTED] pursuant to K. Perigoe comments; confer with K. Perigoe regarding same	2.2
02/07/21	K Perigoe	Revise memorandum regarding [REDACTED]	0.4
02/08/21	S Diamant	Draft and revise memorandum on [REDACTED] claims; circulate memorandum on [REDACTED] claims to HPE and nonprofit teams; draft chart summarizing claims [REDACTED]	1.4
02/08/21	A Johnson	Emails with team regarding strategy and research status; prepare for common interest call	0.3
02/08/21	M Strong	Review S. Diamant's memorandum regarding [REDACTED]; draft chart of possible claims	0.8
02/09/21	S Diamant	Draft chart summarizing claims [REDACTED]; confer with	1.9

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Date	Timekeeper	Description	Hours
		M. Strong [REDACTED] regarding same; confer with A. Johnson and team regarding call agenda; telephone conference with HPE and nonprofit team regarding status and strategy	
02/09/21	K Perigoe	Review memorandum regarding constitutional issues	0.4
02/09/21	M Strong	Finalize and circulate overview of claims chart; correspondence with team	0.6
02/10/21	M Strong	Work on overview of claims chart	0.3
02/16/21	S Diamant	Telephone conference with HPE and nonprofit team regarding status and strategy; confer with ACLU counsel regarding logistics	0.4
02/16/21	A Johnson	Confer with common interest counsel regarding strategy; emails regarding same	0.5
02/16/21	K Perigoe	Attend common interest meeting; internal emails and conferences regarding same	0.5
02/16/21	M Strong	Participate in weekly team call; summarize and circulate call notes to the group	0.6
02/23/21	S Diamant	Confer with A. Johnson and team regarding status and strategy	0.4
02/23/21	A Johnson	Teleconference with Law Foundation regarding strategy; emails with team regarding same	1.0
02/23/21	Q Ta	Confer with Law Foundation lawyers; attend team meeting	1.0
03/01/21	S Diamant	Confer with M. Strong and team regarding scheduling and tasks;	1.0

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Date	Timekeeper	Description	Hours
		telephone conference with Q. Ta and team regarding status and strategy	
03/02/21	A Johnson	Confer with team regarding strategy	0.3
03/02/21	Q Ta	Confer with HPE team regarding strategy decisions	0.5
03/02/21	Q Ta	Attend and participate in weekly meeting	0.5
03/02/21	Q Ta	Review and edit complaint; confer with team regarding same	2.0
03/09/21	S Diamant	Telephone conference with joint defense group regarding status and strategy; confer with Q. Ta and team regarding strategy and tasks	1.3
03/15/21	Q Ta	Confer with team regarding tasks	0.5
03/16/21	S Diamant	Confer with Q. Ta and team regarding status and strategy	1.1
03/16/21	M Strong	Work on chart of [REDACTED] and related correspondence; participate in weekly team meeting	2.3
03/16/21	Q Ta	Confer with team regarding next steps and interviewing plaintiffs	0.5
03/22/21	S Diamant	Telephone conference with R. Rubens regarding case background and strategy; review materials in preparation for same	0.9
03/22/21	R Rubens	Onboarding call with S. Diamant	0.5

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Date	Timekeeper	Description	Hours
03/23/21	Q Ta	Call with ACLU and team regarding case issues	0.5
03/28/21	R Rubens	Research [REDACTED] and draft memorandum	3.8
03/29/21	S Diamant	Confer with R. Rubens regarding research on [REDACTED] issues and related strategy	0.6
03/29/21	A Johnson	Prepare for plaintiff interview; emails regarding same	0.2
03/29/21	R Rubens	Research [REDACTED] and work on memorandum	2.7
03/30/21	S Diamant	Telephone conference with HP Enterprise, ACLU and common interest group regarding status and strategy	0.5
03/30/21	A Johnson	Analyze preliminary injunction motions; confer with common interest team on case strategy	0.6
03/30/21	R Rubens	Research and analyze [REDACTED]	2.5
03/31/21	R Rubens	Write draft memorandum on [REDACTED]	2.5
04/01/21	R Rubens	Draft memorandum [REDACTED]	1.2
04/02/21	R Rubens	Finalize memorandum on [REDACTED]	2.2
04/05/21	S Diamant	Review and comment on research memorandum by R. Rubens	0.5
04/13/21	Q Ta	Confer with ACLU, DRA, and Law Foundation regarding lawsuit	0.8
04/16/21	S Diamant	Telephone conference with Law Foundation regarding Mountain View complaint and preliminary injunction strategy; confer with Q. Ta and A. Johnson regarding status and strategy	1.0

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Date	Timekeeper	Description	Hours
04/20/21	Q Ta	Attend and participate in weekly call	0.5
04/21/21	A Johnson	Analyze memorandum regarding [REDACTED]; emails with team regarding same	0.3
04/29/21	A Johnson	Analyze draft complaint; emails with team regarding same and next steps; analyze [REDACTED]	0.5
05/01/21	R Rubens	Review draft complaint and provide feedback	1.4
05/02/21	S Diamant	Review and comment on draft complaint	2.0
05/03/21	A Johnson	Emails regarding strategy for draft complaint; analyze same	0.5
05/04/21	S Diamant	Conference with HPE and K&S teams regarding draft complaint; confer with R. Rubens regarding [REDACTED]; conference with common interest group regarding status and strategy	1.8
05/04/21	A Johnson	Telephone conference regarding strategy for draft complaint; revise same; emails regarding same	1.5
05/05/21	R Rubens	Revise and edit first draft of complaint	2.6
05/06/21	S Diamant	Draft and revise complaint	6.5
05/06/21	A Johnson	Revise draft complaint; emails with team regarding same	1.0
05/07/21	A Johnson	Revise draft complaint; emails with team regarding same	0.2
05/08/21	A Johnson	Edit draft complaint	1.0
05/10/21	S Diamant	Finalize revised draft complaint; confer with A. Johnson and team regarding same	1.5
05/11/21	S Diamant	Confer with HP Enterprise team regarding comments on draft complaint; confer with Law Foundation team regarding call scheduling	0.5
05/13/21	S Diamant	Conference with Law Foundation team regarding draft complaint and related strategy; summarize in writing for A. Johnson and team	0.5
05/13/21	R Rubens	Call with Law Foundation regarding edits to complaint	0.3
05/16/21	R Rubens	Review PRA responses from City	1.0
05/18/21	S Diamant	Confer with common interest and case teams regarding status and strategy	1.0
05/18/21	A Johnson	Emails with S. Diamant and R. Reubens regarding strategy, demand letter, and PRA responses	0.5
05/20/21	R Rubens	Draft demand letter	1.0
05/21/21	R Rubens	Finalize demand letter	1.8
05/24/21	S Diamant	Draft and revise demand letter to City of Mountain View; confer with A. Johnson and team regarding same	2.5

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Date	Timekeeper	Description	Hours
05/25/21	S Diamant	Draft demand letter to City of Mountain View; telephone conference with common interest team regarding status and strategy	0.9
05/25/21	A Johnson	Emails with S. Diamant and R. Ruben regarding revised correspondence and strategy for same	0.3
05/25/21	Q Ta	Attend weekly team meeting; review task list and demand letter for same	0.7
05/26/21	S Diamant	Draft and revise demand letter; confer with A. Johnson and team regarding same	1.4
05/26/21	A Johnson	Further revise draft demand letter	0.2
05/27/21	A Johnson	Observe hearing and emails regarding same	0.4
06/01/21	A Johnson	Common interest teleconference regarding strategy; emails with team regarding same	0.6
06/02/21	A Johnson	Emails regarding strategy for demand letter; revise same	0.2
06/04/21	S Diamant	Draft, revise and finalize demand letter to City of Mountain View; confer with R. Rubens and common interest group regarding same	1.2
06/04/21	R Rubens	Finalize demand letter	0.6
06/08/21	S Diamant	Summarize standing call in writing for Q. Ta and team	0.4
06/08/21	Q Ta	Attend weekly meeting	0.6
06/15/21	A Johnson	Telephone conference with common interest counsel regarding complaint strategy	0.5
06/16/21	S Diamant	Confer with translation service and co-counsel regarding translation of complaint	0.5
06/16/21	R Rubens	Revise new draft of complaint	0.8
06/17/21	S Diamant	Review and comment on draft complaint; confer with team regarding same	1.2

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Date	Timekeeper	Description	Hours
06/17/21	A Johnson	Revise draft complaint	0.3
06/18/21	A Johnson	Revise draft complaint; emails regarding same; analyze response from City of Mountainview	1.0
06/21/21	S Diamant	Confer with common interest group regarding draft complaint	0.5
06/22/21	S Diamant	Review City's response to demand letter; telephone conference with common interest group regarding status and strategy; confer with Q. Ta and A. Johnson regarding attendance at post-filing press conference	1.2
06/22/21	A Johnson	Emails with S. Diamant and Q. Ta regarding strategy for complaint	0.2
06/22/21	Q Ta	Confer with team regarding complaint and demand letter	0.5
06/23/21	A Johnson	Emails with joint team regarding strategy for revised complaint	0.2
06/25/21	S Diamant	Telephone conference with R. Rubens and A. Hines regarding status and strategy	1.0
06/25/21	A Johnson	Emails with team regarding strategy for complaint	0.2
06/28/21	S Diamant	Telephone conference with Law Foundation and team regarding complaint timing; confer with Q. Ta and team regarding same	1.0
07/06/21	S Diamant	Telephone conference with common interest group regarding status and strategy; summarize status in writing for D. Kwong	0.6
07/06/21	Q Ta	Attention to call with non-profits and planning for filing	0.5
07/07/21	S Diamant	Confer with team regarding [REDACTED]	0.5
07/07/21	A Johnson	Emails with team regarding [REDACTED] [REDACTED]	0.3
07/08/21	S Diamant	Review and provide final comments on draft complaint; confer with Q. Ta and team regarding status and strategy	2.5
07/13/21	S Diamant	Confer with Law Foundation regarding filing plan; conference with common interest group regarding status and strategy;	2.9

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Date	Timekeeper	Description	Hours
		review, draft and finalize complaint against City of Mountain View; confer with S. Butler and R. Pada regarding same	
07/13/21	Q Ta	Attention to client call and confer with S. Diamant regarding same	1.5
07/14/21	A Johnson	Emails with team regarding filing complaint and strategy for same; revise same	1.0
07/21/21	S Diamant	Confer with R. Rubens regarding research assignments	0.3
07/22/21	R Rubens	Review [REDACTED]	1.4
07/23/21	S Diamant	Confer with Q. Ta regarding preliminary injunction planning and strategy; telephone conference with Law Foundation team regarding same; review preliminary injunction briefing from Pacifica action	1.5
07/23/21	S Diamant	Review and comment on [REDACTED]	1.2
07/23/21	Q Ta	Call with team to discuss preliminary injunction motion	0.7
07/24/21	R Rubens	Review [REDACTED]	3.4
07/26/21	R Rubens	Finalize and send to team members [REDACTED] research	0.2
07/27/21	S Diamant	Confer with Q. Ta and team regarding status and strategy	0.8
			1.0
07/27/21	Q Ta	Attend weekly call	0.5

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Date	Timekeeper	Description	Hours
07/28/21	R Rubens	Strategy call with A. Johnson and S. Diamant	0.6
07/29/21	R Rubens	Review witness declarations [REDACTED]	0.5
07/30/21	A Johnson	Analyze comments [REDACTED]; emails with team regarding strategy for same	0.3
07/30/21	R Rubens	Review witness declarations [REDACTED]	1.8
08/01/21	S Diamant	Research and draft preliminary injunction motion against the City of Mountain View	1.0
08/02/21	S Diamant	Draft and finalize stipulation with City of Mountain View on time to respond to complaint and briefing deadlines; confer with Plaintiffs' co-counsel regarding same	0.7
08/03/21	S Diamant	Research and draft preliminary injunction motion against the City of Mountain View	6.1
08/03/21	A Johnson	Confer with team regarding strategy for preliminary injunction	0.2
08/03/21	R Rubens	Review case updates and begin drafting [REDACTED] portion of preliminary injunction motion	0.8
08/04/21	S Diamant	Research and draft preliminary injunction motion against the City of Mountain View	2.8
08/04/21	S Diamant	Research and draft preliminary injunction motion against the City of Mountain View	2.8
08/05/21	S Diamant	Research and draft preliminary injunction motion against the City of Mountain View	7.2
08/05/21	R Rubens	Research and draft insert on [REDACTED] for preliminary injunction motion	4.3
08/06/21	S Diamant	Confer with team regarding [REDACTED] strategy; review comments and changes from Q. Ta and team on draft preliminary injunction motion	1.4
08/06/21	A Johnson	Revise preliminary injunction motion and emails regarding same	1.5
08/06/21	K Perigoe	Revise preliminary injunction motion	2.5
08/07/21	Q Ta	Review and edit preliminary injunction motion and confer with team regarding same	1.5
08/09/21	S Diamant	Draft and revise preliminary injunction motion pursuant to comments by Q. Ta and team; research issues flagged by comments from K. Perigoe and team	4.1
08/09/21	R Rubens	Research case law on [REDACTED]	1.5
08/10/21	S Diamant	Finalize and circulate draft preliminary injunction motion	1.3
08/10/21	A Johnson	Revise preliminary injunction motion; confer with S. Diamant regarding same	0.4
08/11/21	S Diamant	Draft agenda for strategy call; confer with A. Johnson and team	1.5

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Date	Timekeeper	Description	Hours
		regarding same; review [REDACTED] comments on draft preliminary injunction motion	
08/11/21	A Johnson	Emails with S. Diamant regarding strategy for preliminary injunction motion	0.2
08/11/21	R Rubens	Review latest draft of preliminary injunction motion	0.7
08/12/21	S Diamant	Conference with ACLU and non-profit team regarding strategy on preliminary injunction motion; confer with Q. Ta and team regarding same; draft case management conference statement	2.2
08/12/21	A Johnson	Revise papers and emails with S. Diamant regarding strategy	0.5
08/12/21	R Rubens	Call and strategize with nonprofit groups regarding upcoming preliminary injunction motion	1.5
08/14/21	S Diamant	Draft case management conference statement; review standing order regarding same	3.0
08/15/21	S Diamant	Draft and revise case management conference statement pursuant to A. Johnson comments	1.1
08/15/21	A Johnson	Edit CMC Statement	0.5
08/16/21	S Diamant	Draft and circulate CMC statement to co-counsel	0.3
08/17/21	S Diamant	Conference with co-counsel regarding status and strategy; revise and finalize draft CMC statement	1.3
08/17/21	A Johnson	Edits to drafts; confer with team regarding strategy following meet and confer	0.3
08/17/21	Q Ta	Attend weekly call and attention to motion to dismiss	2.0
08/19/21	S Diamant	Conference with City regarding 26(f) and initial case management conference; draft and revise preliminary injunction motion; confer with team regarding same	1.3
08/19/21	A Johnson	Edit preliminary injunction brief materials and emails with S. Diamant and team regarding strategy for same	1.3
08/20/21	S Diamant	Confer with team regarding status, strategy and case deadlines	0.8
08/24/21	S Diamant	Draft, revise and finalize case management conference statement; prepare for filing; confer with team regarding same	3.0
08/24/21	K Perigoe	Confer with team regarding case strategy	0.5
08/25/21	S Diamant	Draft and revise preliminary injunction pursuant to comments from co-counsel	2.4
08/25/21	A Johnson	Telephone conferences regarding strategy; analyze motion to dismiss; telephone conference with R. Reubens regarding opposition to motion to dismiss	1.3
08/25/21	K Perigoe	Confer with co-counsel regarding discovery and motion practice strategy	0.2

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Date	Timekeeper	Description	Hours
08/25/21	R Rubens	Discuss upcoming tasks with A. Johnson	0.5
08/26/21	S Diamant	Draft proposed order granting preliminary injunction; draft and revise preliminary injunction brief	1.3
08/26/21	R Rubens	Draft initial disclosures	3.6
08/28/21	S Diamant	Draft preliminary injunction motion and proposed order	0.5
08/29/21	S Diamant	Draft and finalize preliminary injunction motion	2.0
08/29/21	A Johnson	Edits to initial disclosures; emails with R. Reubens regarding same	0.5
08/30/21	S Diamant	Finalize preliminary injunction motion with tables and exhibits for filing; confer with paralegal team regarding same	3.1
08/30/21	A Johnson	Emails regarding strategy for opposition to motion to dismiss and CMC preparation; telephone conference with R. Reubens and K. Perigoe regarding same	0.4
08/30/21	K Perigoe	Confer with R. Rubens regarding opposition to motion to dismiss	1.0
08/30/21	R Rubens	Review motion to dismiss in preparation for drafting opposition; confer with K. Perigoe and A. Johnson regarding same; incorporate comments from A. Johnson into initial disclosures	1.6
08/30/21	Q Ta	Attend call regarding CMC	0.7
08/31/21	S Diamant	Attend case management conference; summarize for team	1.0
08/31/21	A Johnson	Emails regarding strategy for opposition to motion to dismiss and CMC outcome	0.5
08/31/21	R Rubens	Attend CMC and post-CMC team debrief	0.8
09/01/21	K Perigoe	Confer with team regarding motion to dismiss Opposition	0.8
09/01/21	R Rubens	Discuss strategy for motion to dismiss briefing with S. Diamant, K. Perigoe and A. Johnson	1.0
09/02/21	S Diamant	Draft stipulation regarding class certification issues with City; confer with co-counsel regarding same	1.0
09/02/21	R Rubens	Review and provide feedback on provisional class certification motion	0.4
09/03/21	R Rubens	Send stipulation for provisional class certification to City counsel	0.2
09/06/21	R Rubens	Draft outline for opposition to City's motion to dismiss complaint	2.6
09/07/21	A Johnson	Confer with team regarding strategy for opposition to motion to dismiss	0.2
09/07/21	K Perigoe	Revise opposition to motion to dismiss	0.2
09/07/21	R Rubens	Draft outline for opposition to motion to dismiss	2.2
09/07/21	R Rubens	Continue outlining opposition to motion to dismiss	2.4
09/08/21	S Diamant	Review and comment on R. Rubens outline for opposition to motion to dismiss	1.5
09/08/21	A Johnson	Emails regarding strategy for opposition to motion to dismiss and outline regarding same	0.5

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Date	Timekeeper	Description	Hours
09/09/21	R Rubens	Call with S. Diamant regarding motion to dismiss opposition; draft motion to dismiss opposition	2.7
09/10/21	R Rubens	Draft opposition to motion to dismiss	6.6
09/12/21	S Diamant	Draft and revise opposition to motion to dismiss	2.0
09/12/21	K Perigoe	Revise opposition to motion to dismiss	1.3
09/13/21	A Johnson	Revise brief; emails with team regarding strategy for same	0.8
09/13/21	R Rubens	Incorporate comments into motion to dismiss opposition and revise draft	5.0
09/14/21	S Diamant	Draft opposition brief on motion to dismiss; confer with City regarding form of protective order	4.0
09/14/21	A Johnson	Edit briefs and supporting documents	2.3
09/14/21	K Perigoe	Revise opposition to motion to dismiss	4.0
09/14/21	R Rubens	Weekly call with nonprofit groups	0.5
09/15/21	S Diamant	Draft opposition to motion to dismiss	1.0
09/15/21	A Johnson	Analyze RJD and conferences with team regarding strategy for same; revise same	0.9
09/15/21	K Perigoe	Draft opposition to RJD	3.6
09/15/21	R Rubens	Revise opposition to motion to dismiss	5.0
09/16/21	S Diamant	Draft opposition to City's request for judicial notice	1.5
09/16/21	K Perigoe	Revise opposition to RJD	4.2
09/16/21	R Rubens	Compile and send discovery to common interest group for review	0.1
09/17/21	S Diamant	Draft and revise briefs on opposition to motion to dismiss and request for judicial notice	1.8
09/17/21	A Johnson	Revise opposition to request for judicial notice; emails with team regarding plan and strategy	1.5
09/17/21	R Rubens	Edit motion to dismiss and request for judicial notice oppositions	1.7
09/18/21	S Diamant	Draft opposition to motion to dismiss pursuant to comments from group	1.4
09/18/21	R Rubens	Motion to dismiss opposition follow-up research and edits	1.5
09/18/21	Q Ta	Edit motion to dismiss and provide comments to same; confer with team	1.5
09/19/21	S Diamant	Draft, revise and finalize oppositions to motion to dismiss and request for judicial notice	2.5
09/19/21	A Johnson	Revise opposition to motion to dismiss and emails with team regarding same	0.7
09/19/21	R Rubens	Cite check and finalize opposition to motion to dismiss	2.4
09/20/21	S Diamant	Draft, revise and prepare opposition brief to motion to dismiss for filing	4.0
09/20/21	A Johnson	Revise opposition to motion to dismiss and request for judicial notice and emails regarding same	0.9

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Date	Timekeeper	Description	Hours
09/20/21	K Perigoe	Revise opposition to RJD	0.6
09/20/21	R Rubens	Edit and finalize request for judicial notice	0.9
09/21/21	S Diamant	Conference with co-counsel; summarize in writing for team	0.9
09/21/21	A Johnson	Analyze final submissions; analyze opposition to preliminary injunction motion; emails with team regarding reply papers	0.4
09/21/21	Q Ta	Confer with team regarding strategy	0.5
09/22/21	S Diamant	Conference with City counsel regarding meet and confer; confer with team regarding same	0.9
09/22/21	R Rubens	Attend meet and confer with city regarding protective order	0.3
09/23/21	S Diamant	Draft protective order; review City's opposition to preliminary injunction motion	2.3
09/23/21	A Johnson	Emails with team regarding strategy for stipulated protective order	0.2
09/24/21	S Diamant	Draft reply brief in support of motion for preliminary injunction	5.5
09/24/21	A Johnson	Telephone conference regarding reply brief strategy; analyze opposition to preliminary injunction motion	0.8
09/24/21	K Perigoe	Confer with team regarding reply strategy	0.9
09/24/21	R Rubens	Strategy call regarding reply brief	0.8
09/24/21	Q Ta	Confer with team regarding reply brief	1.0
09/25/21	S Diamant	Draft reply brief in support of motion for preliminary injunction	2.5
09/26/21	S Diamant	Draft reply brief in support of motion for preliminary injunction	6.0
09/27/21	S Diamant	Draft and revise reply brief on preliminary injunction motion pursuant to A. Johnson and K. Perigoe comments	3.0
09/27/21	A Johnson	Edit draft preliminary injunction reply; emails with team regarding same	2.0
09/27/21	K Perigoe	Revise reply in support of preliminary injunction motion	2.1
09/28/21	S Diamant	Draft and revise reply brief on preliminary injunction motion; confer with group regarding same; conference with co-counsel regarding status and strategy	3.5
09/28/21	A Johnson	Emails with team regarding strategy for preliminary injunction reply	0.3
09/28/21	K Perigoe	Confer with team regarding reply strategy	0.7
09/28/21	R Rubens	Weekly call with nonprofit groups and summarize notes for internal team	1.0
10/01/21	S Diamant	Draft and revise reply brief pursuant to comments from co-counsel; confer with A. Johnson and K. Perigoe regarding same; confer with co-counsel regarding same	4.5
10/03/21	A Johnson	Revise preliminary injunction reply and emails regarding same	1.0
10/04/21	S Diamant	Finalize reply brief in support of preliminary injunction motion and prepare for filing	3.0
10/04/21	A Johnson	Analyze briefing by City; edit reply briefing	1.0

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 420356 Challenge To RV Ban (City Of Mountain Vi
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Date	Timekeeper	Description	Hours
10/05/21	S Diamant	Confer with A. Johnson and team regarding hearing assignments; conference with co-counsel regarding status and strategy; summarize hearing assignments in writing for team; confer with team regarding same	2.0
10/05/21	A Johnson	Telephone conference regarding strategy for oral argument	0.5
10/06/21	S Diamant	Confer with paralegal team regarding hearing preparation and binders for same	0.4
10/13/21	S Diamant	Analyze case law and materials in advance of hearing	0.7
10/14/21	S Diamant	Prepare for motion to dismiss argument; prepare agenda for moot arguments	1.5
10/18/21	S Diamant	Prepare for moot argument on motion to dismiss opposition; conference with co-counsel regarding moot argument on motion to dismiss opposition and preliminary injunction hearing	2.0
10/19/21	S Diamant	Review case law in preparation for hearing argument on motion to dismiss; outline arguments regarding same; confer with co-counsel regarding outline of arguments and hearing attendance issues	6.0
10/20/21	S Diamant	Prepare for and attending hearing in N.D. Cal. on motion to dismiss and preliminary injunction; confer with co-counsel team regarding same; conference with A. Johnson regarding feedback on hearing argument	2.5
10/20/21	A Johnson	Attend hearing; prepare and post-calls regarding same	1.5
10/27/21	S Diamant	Confer with Law Foundation team regarding status and strategy	0.7
11/01/21	S Diamant	Review draft press release regarding motion to dismiss and preliminary injunction; confer with City's counsel regarding request for discovery deadline extension; confer with A. Johnson and team regarding same	0.9
11/01/21	A Johnson	Emails with S. Diamant regarding discovery and strategy	0.1
11/02/21	S Diamant	Draft agenda for standing call; conference with co-counsel regarding status and strategy; confer with Defendant's counsel regarding stipulation on request for extension of discovery response deadlines	0.9
11/02/21	A Johnson	Telephone conference with team regarding discovery and case	0.5

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Date	Timekeeper	Description	Hours
		strategy	
11/03/21	S Diamant	Confer with Defendant's counsel regarding stipulation for extension of discovery response deadlines; review and comment on draft stipulation; confer with co-counsel regarding same	0.4
11/04/21	S Diamant	Review and comment on stipulation from City regarding extension of discovery deadlines; confer with opposing counsel regarding same	0.5
11/10/21	S Diamant	Review and analyze order on motion to dismiss and preliminary injunction	0.3
11/11/21	S Diamant	Confer with co-counsel regarding outreach from City regarding settlement	0.3
11/15/21	S Diamant	Confer with team regarding standing call	0.2
11/16/21	S Diamant	Conference with co-counsel regarding status and strategy	0.5
11/17/21	S Diamant	Conference with City counsel regarding settlement; confer with co-counsel regarding same; summarize in writing for team	1.4
11/29/21	S Diamant	Conference with Magistrate Judge van Keulen regarding settlement conference scheduling; review and comment on draft settlement proposal to City	1.1
11/29/21	R Rubens	Review City's draft of Joint CMC statement	1.2
11/30/21	S Diamant	Review draft letter to City; review and comment on draft case management conference statement; confer with co-counsel regarding status and strategy	1.3
11/30/21	A Johnson	Emails with team and revise settlement letter and CMC statement	0.4
11/30/21	R Rubens	Weekly call, confer with S. Diamant regarding CMC statement and case	0.8
12/01/21	S Diamant	Review and comment on draft case management statement; comment on settlement demand letter	0.7
12/09/21	S Diamant	Conference with City regarding potential settlement discussions; confer with team regarding same	1.0
12/14/21	S Diamant	Draft update to K&S team regarding status of settlement discussions; conference with team regarding status and strategy; confer with organizations regarding settlement status	2.0
12/14/21	A Johnson	Common interest telephone conference with team regarding next steps	0.5
12/16/21	S Diamant	Confer with co-counsel regarding status and settlement strategy	0.7
			0.4

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Date	Timekeeper	Description	Hours
12/17/21	S Diamant	Conference with co-counsel regarding terms for stay of litigation; conference with City's counsel regarding same; confer with team regarding draft stay terms in writing	2.0
12/20/21	S Diamant	Conference with co-counsel regarding settlement strategy; draft terms for proposed litigation stay	0.8
12/22/21	S Diamant	Conference with co-counsel regarding settlement issues	0.4
			<hr/> 431.3

TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Value
Arwen Johnson	43.4	\$ 1015.00	\$44,051.00
Kelly Perigoe	34.7	960.00	33,312.00
Quyen Ta	22.8	1070.00	24,396.00
Sam Diamant	213.1	909.43	193,799.53
Rachel Rubens	87.4	550.00	48,070.00
Meghan Strong	29.9	645.00	19,285.50
Total	431.3		<hr/> \$362,914.03

Total This Invoice \$362,914.03

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SWIFT: SNTRUS3A
USD Account: 88003 12475
Account Name: King & Spalding

Invoice No.	10558179
Invoice Date	09/21/22
Client No.	99994
Matter No.	420356

RE: Challenge To RV Ban (City Of Mountain View)

For questions, contact:
Quyen Ta 1 415 318 1227

REMITTANCE

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Amount Due This Invoice	\$362,914.03
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USD Account: 88003 12475
Account Name: King & Spalding

Invoice No.	10558181
Invoice Date	09/21/22
Client No.	99994
Matter No.	420356

RE: Challenge To RV Ban (City Of Mountain View)

For questions, contact:
Quyen Ta 1 415 318 1227

For Professional Services Rendered through 09/14/22:

Fees	\$	90,144.62
Total this Invoice	\$	90,144.62

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PROFESSIONAL SERVICES

Date	Timekeeper	Description	Hours
01/13/22	S Diamant	Confer with co-counsel regarding settlement negotiation issues	1.0
01/14/22	S Diamant	Research California law regarding [REDACTED] [REDACTED]	1.8
01/18/22	S Diamant	Conference with co-counsel regarding status and strategy; review and comment on correspondence regarding [REDACTED] [REDACTED]	1.3
01/22/22	S Diamant	Research California authority regarding [REDACTED] [REDACTED]	1.0
01/24/22	S Diamant	Draft memorandum summarizing findings on [REDACTED] [REDACTED]	1.6
01/25/22	S Diamant	Draft memorandum summarizing findings on [REDACTED] [REDACTED]	2.5
01/25/22	M Strong	Participate in weekly team call	0.5
01/26/22	R Rubens	Review memorandum written by S. Diamant	0.2
01/26/22	M Strong	Review memorandum prepared by S. Diamant regarding [REDACTED]	0.1
01/31/22	S Diamant	Analyze settlement offer from City	0.5
01/31/22	M Strong	Analyze city's settlement offer and related correspondence	0.2
02/01/22	S Diamant	Review and comment on draft settlement terms from co-counsel	0.4
02/01/22	M Strong	Analyze the city's settlement offer and related correspondence with S. Diamant	0.2
02/07/22	A Johnson	Telephone conference regarding settlement strategy; analyze settlement correspondence in preparation for same	1.5
02/07/22	R Rubens	Attend settlement discussion	0.9
02/07/22	M Strong	Review draft settlement response and participate in team call regarding same	1.2
02/08/22	S Diamant	Review and comment on settlement correspondence with City	0.7
02/08/22	A Johnson	Revise correspondence; confer with team on settlement strategy	0.3
02/08/22	M Strong	Review and revise settlement letter	0.2
02/11/22	M Strong	Discussion regarding settlement and city's response to our counter-proposal	0.2
02/15/22	A Johnson	Emails with S. Diamant regarding strategy for settlement	0.3

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Date	Timekeeper	Description	Hours
02/15/22	M Strong	Review response from the city; participate in weekly team call	1.0
02/16/22	A Johnson	Edit settlement correspondence; emails with team regarding same	0.3
02/16/22	M Strong	Review draft response letter	0.1
02/22/22	S Diamant	Conference with co-counsel regarding status and strategy	1.2
02/22/22	A Johnson	Emails regarding settlement statements and strategy	0.3
02/22/22	K Perigoe	Attend team meeting regarding settlement strategy	1.0
02/24/22	M Strong	Review and revise draft mediation statement; review motion to dismiss decision	1.4
02/27/22	M Strong	Review and revise mediation statement	0.8
02/28/22	M Strong	Correspondence with team regarding conference with defendants and mediation statements	0.4
03/01/22	S Diamant	Review and comment on draft mediation statement; conference with co-counsel regarding status and strategy	3.0
03/01/22	M Strong	Review and revise mediation statement	0.7
03/08/22	S Diamant	Conference with co-counsel regarding status and strategy; draft agenda for same	1.4
03/08/22	A Johnson	Emails regarding settlement statements	0.5
03/08/22	M Strong	Correspondence with team regarding mediation	0.5
03/09/22	S Diamant	Attend settlement conference with Magistrate Judge van Keulen, City and co-counsel; conference with co-counsel regarding same; summarize settlement conference notes, analysis and action items in writing	4.5
03/09/22	M Strong	Correspondence with team about settlement conference	0.3
03/15/22	S Diamant	Conference with co-counsel regarding status and strategy; draft agenda regarding same	0.7
03/16/22	S Diamant	Conference with T. Zito regarding [REDACTED]	0.5
03/17/22	S Diamant	Draft correspondence to City regarding [REDACTED]; review Ninth Circuit case law regarding same	3.0
03/18/22	S Diamant	Draft correspondence to City regarding [REDACTED]; review Ninth Circuit case law regarding same	2.0
03/22/22	S Diamant	Draft and revise settlement correspondence; draft agenda for standing call	0.7

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Date	Timekeeper	Description	Hours
03/25/22	S Diamant	Draft, revise and finalize letter submission to City's counsel regarding [REDACTED]; confer with D. Kwong (Hewlett Packard Enterprise) regarding comment on same; confer with co-counsel regarding same	2.3
03/29/22	S Diamant	Conference with co-counsel regarding status and strategy; conference with Magistrate Judge van Keulen regarding settlement negotiations; conference with settlement team regarding same	2.0
03/30/22	S Diamant	Attend mediation with Magistrate Judge van Keulen; conference with co-counsel regarding same	3.6
03/31/22	S Diamant	Telephone conference with Magistrate Judge van Keulen regarding settlement issues; confer with co-counsel regarding same	1.0
04/01/22	S Diamant	Draft summary of settlement discussions for case team and D. Kwong	1.0
04/05/22	S Diamant	Conference with co-counsel regarding case status and strategy	0.9
04/07/22	S Diamant	Review and comment on draft statement to court regarding [REDACTED]	0.3
04/12/22	S Diamant	Conference with co-counsel regarding status and strategy	0.8
04/12/22	R Rubens	Discuss ongoing case issues and upcoming settlement conference	0.7
04/13/22	M Strong	Correspondence with S. Diamant regarding settlement negotiations, anticipated settlement offer, and call with mediation judge	0.4
04/14/22	M Strong	Participate in call with settlement judge and circulate summary to team	0.7
04/15/22	M Strong	Review city's settlement proposal; participate in team call to discuss settlement; draft summary of points to cover during call with judge and related follow-up correspondence	2.5
04/18/22	S Diamant	Conference with Magistrate Judge van Keulen regarding mediation; confer with co-counsel regarding same; summarize settlement negotiation status for case team	2.5
04/19/22	S Diamant	Review and comment on draft settlement agreement	0.8
04/25/22	S Diamant	Conference with co-counsel team regarding settlement negotiations	0.5
04/26/22	S Diamant	Conference with team regarding case status and settlement negotiations	0.4
05/03/22	S Diamant	Conference with co-counsel regarding settlement strategy; draft agenda for standing call; confer with team regarding status	1.7
05/05/22	S Diamant	Attend half-day conference With Magistrate Judge regarding mediation; review and comment on summary from ACLU counsel regarding negotiation status; draft correspondence to co-	3.5

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Date	Timekeeper	Description	Hours
		counsel regarding result of mediation session	
05/10/22	S Diamant	Draft agenda for standing call with co-counsel; review and summarize analysis of [REDACTED] [REDACTED]; conference with co-counsel group regarding status and strategy	1.5
05/13/22	R Rubens	Attend meeting with co-counsel prior to conference call with City's attorney [REDACTED]	1.1
05/20/22	S Diamant	Review draft settlement agreement from City of Mountain View; conference with co-counsel regarding negotiation strategy in response to City draft settlement agreement	1.4
05/23/22	S Diamant	Conference with co-counsel team regarding settlement status and strategy	1.1
05/24/22	S Diamant	Conference with City's counsel regarding continued negotiation of settlement agreement; conference with co-counsel regarding same	1.3
05/31/22	S Diamant	Conference with co-counsel regarding status and strategy	1.5
06/07/22	S Diamant	Review and comment on draft settlement agreement; conference with co-counsel team regarding status and strategy; draft update to D. Kwong regarding status and strategy	1.9
06/21/22	S Diamant	Confer with co-counsel regarding status and strategy	0.8
07/08/22	S Diamant	Participate in conference with settlement Magistrate Judge regarding next steps in settlement negotiations	0.5
07/12/22	S Diamant	Conference with co-counsel regarding status and strategy; confer with A. Johnson and case team regarding update on same	1.0
07/19/22	S Diamant	Conference with co-counsel team regarding status and strategy; confer with A. Johnson and team regarding same; confer with vendor regarding translation services	1.4
07/20/22	S Diamant	Confer with co-counsel regarding status and strategy; confer with M. Strong regarding status and strategy	0.5
07/20/22	M Strong	Correspondence with S. Diamant regarding settlement negotiations	0.2
07/26/22	M Strong	Participate in call with team regarding settlement and related correspondence with team	0.9
08/02/22	S Diamant	Conference with co-counsel regarding status and strategy	0.9
08/08/22	S Diamant	Review draft settlement agreement; confer with co-counsel regarding same	0.5
08/09/22	S Diamant	Conference with co-counsel regarding settlement negotiations and strategy; confer with team regarding same	0.7
08/11/22	S Diamant	Confer with co-counsel regarding settlement negotiations; review draft agreement regarding same	1.0
08/18/22	S Diamant	Conference with co-counsel regarding status of settlement discussions; confer with K&S and HPE team regarding	0.9

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Date	Timekeeper	Description	Hours
		settlement in principle	
08/29/22	S Diamant	Review and analyze draft settlement agreement; confer with co-counsel regarding same	0.3
08/30/22	S Diamant	Conference with co-counsel regarding status and strategy; draft form of joint status report to court; confer with ACLU counsel regarding same	1.0
09/06/22	S Diamant	Conference with co-counsel regarding status and strategy; confer with Q. Ta and team regarding status and strategy; confer with translation service regarding draft settlement agreement	1.3
09/08/22	S Diamant	Confer with team regarding status and strategy; conference with co-counsel regarding settlement strategy	0.9
09/09/22	S Diamant	Confer with co-counsel regarding draft correspondence to City's attorney	0.3
09/12/22	S Diamant	Conference with co-counsel regarding settlement status and strategy	0.8
09/13/22	S Diamant	Conference with co-counsel regarding status and strategy	0.5
09/14/22	S Diamant	Conference with Judge Cousins regarding settlement status; conference with B. Freeman and T. Zito regarding same	0.7
09/14/22	M Strong	Correspondence with team regarding next steps to finalize settlement	0.4
			91.8

TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Value
Arwen Johnson	3.2	\$ 1125.00	\$3,600.00
Kelly Perigoe	1.0	1125.00	1125.00
Sam Diamant	71.8	1024.61	73,566.99
Rachel Rubens	2.9	639.70	1,855.13
Meghan Strong	12.9	775.00	9,997.5
Total	91.8		\$90,144.62

Total This Invoice \$90,144.62

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Matter No.	420356

RE: Challenge To RV Ban (City Of Mountain View)

For questions, contact:
Quyen Ta 1 415 318 1227

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